

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:

Jason B Sanders
Amy C Sanders

Debtors.

Case # 17-11660

Chapter 7

Honorable Pamela S. Hollis

Set for December 22, 2017 at 10:00 a.m.

NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE that on December 22, 2017, at 10:00 a.m., I shall appear before the Honorable Pamela S. Hollis at Joliet City Hall, 150 West Jefferson Street, 2nd Floor, Joliet, Illinois, or, in her absence, before any other Judge who may be sitting in her stead, and shall then and there present the **FIRST AND FINAL APPLICATION OF SPECIAL COUNSEL FOR INTERIM COMPENSATION AND REIMBURSEMENT**, a copy of which is attached hereto and hereby served upon you.

Cindy M. Johnson, not individually but as
Chapter 7 Trustee of

Cindy M. Johnson
Johnson Legal Group, LLC
140 S. Dearborn Street, Suite 1510
Chicago, Illinois 60603
(312) 345-1306

/s/ Cindy M. Johnson
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I, Cindy M. Johnson, an attorney, certify that I served true and correct copies of the foregoing notice and document to which it refers to the persons listed on the attached service list via electronic service on those registered in the CM/ECF system and, for those not listed in the CM/ECF system, at the addresses listed, by placing them in envelopes, properly addressed, with proper postage prepaid, and depositing them in the United States Mail Chute at 140 S. Dearborn Street, Chicago, Illinois at or before 5:00 p.m. on December 5, 2017.

/s/ Cindy M. Johnson

SERVICE LIST

Electronic Mail Notice List

- Elizabeth A. Bates ebates@springerbrown.com, iprice@springerbrown.com
- Carleen L Cignetto cignettolaw@gmail.com, lcr67785@notify.bestcase.com
- Cindy M. Johnson cmjtrustee@jnlegal.net, cjohnson@ecf.epiqsystems.com
- Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov
- John A Reed barbf@thebankruptcylaw.com

Manual Notice List

US Mail

Earthmover Credit Union
P.O. Box 2937
Aurora, IL 60507

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

See attached service list

Jason B. Sanders
155 Thackeray Drive
Bolingbrook, IL 60440-1549

AMITA Health Adventist Medical Center
PO Box 9246
Oak Brook IL 60522-9246

AT&T Corp
AT&T Services, Inc
Karen A. Cavagnaro - Lead Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

ATG Credit LLC
1700 W Cortland St # 2
Chicago, IL 60622-1131

Allied Interstate
P.O. Box 361445
Columbus, OH 43236-1445

Ally Financial
PO Box 130424
Roseville MN 55113-0004

Bruce & Lori Sanders
c/o Chuck Bretz & Assoc
58 N Chicago Street
Joliet, IL 60432-4339

CDA/Pontiac
Attn: Bankruptcy
Po Box 213
Streator, IL 61364-0213

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Carrington Mortgage/Wells Fargo
P.O. Box 5001
Westfield, IN 46074-5001

Caterpillar Benefits Center
4 Overlook Point
P.O. Box 1436
Lincolnshire, IL 60069-1436

Certified Services Inc
Po Box 177
Waukegan, IL 60079-0177

Comenity Bank/Meijer
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Comenity Bank/Victoria Secret
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Comenity Capital/Game Stop
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Country Squire HOA
c/o Keough & Moody PC
1250 E Diehl Rd # 405
Naperville, IL 60563-9389

Credit Collection Services
725 Canton Street
Norwood, MA 02062-2679

Creditors Discount and Audit Company
415 E Main St
Streator IL 61364-2927

Daniel P. Fitzgerald
The Fitzgerald Law Firm, P.C.
1220 Iroquois Ave #104
Naperville IL 60563-8581

Dept Of Education/Navient
Attn: Claims Dept
P.O. Box 9635
Wilkes Barr, PA 18773-9635

Edward-Elmhurst Health
P.O. Box 140250
Toledo, OH 43614-0250

GMACn/k/a Ally Financial
P.O. Box 130424
Roseville, MN 55113-0004

General Revenue Corp
4660 Duke Drive # 300
Mason, OH 45040-8466

Illinois Dept of Revenue
Bankruptcy Section
PO Box 64338
Chicago IL 60664-0338

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

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Janis Kilgore
Elizabeth A. Bates
300 S. County Farm Road, Suite 1
Wheaton IL 60187-2438

Kohls/Capital One
Kohls Credit
Po Box 3043
Milwaukee, WI 53201-3043

Medical Business Bureau
1460 Renaissance Dr #400
Park Ridge, IL 60068-1349

Medical Recovery
2250 E Devon
Des Plaines, IL 60018-4519

Merchants Credit Guide
223 W Jackson Blvd # 700
Chicago, IL 60606-6914

Metro Infectious Disease Consultants
Metro Center for Health
901 McClintock Dr # Suite 202
Burr Ridge, IL 60527-0872

MidTax Inc.
P.O. Box 9565
Peoria, IL 61612-9565

NPRTD Illinois, LLC
256 West Data Drive
Draper, UT 84020-2315

Nationwide Credit & Collection Inc
815 Commerce Drive
Suite # 270
Oak Brook, IL 60523-8852

Navient Solutions, LLC. on behalf of
Department of Education Loan Services
PO BOX 9635
Wilkes-Barre, PA 18773-9635

Omega RMS LLC
7505 W Tiffany Springs Parkway
Kansas City, MO 64153-1313

OneMain Financial
Attn: Bankruptcy
601 NW 2nd St
Evansville, IN 47708-1013

OneMain Financial of Illinois, Inc
P.O. Box 3251
Evansville, IN 47731-3251

(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Presence Health
by American InfoSource LP as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

Progressive Leasing
P.O. Box 413110
Salt Lake City, UT 84141-3110

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Real Time Resolutions
1349 Empire Central # 150
Dallas, TX 75247-4029

Rotech Healthcare Inc.
P.O. Box 850001
Orlando, FL 32885-0059

Safeco/Brown & Joseph
1701 Golf Road, Bldg 2
Rolling Meadows, IL 60008-4731

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Synchrony Bank/Care Credit
Attn: Bankruptcy
Po Box 956060
Orlando, FL 32896-0001

Transworld Systems Inc.
Attn: Bankruptcy Processing
500 Virginia Drive # 514
Fort Washington, PA 19034-2707

United Collection Bureau Inc
5620 Southwyck Blvd # 206
Toledo, OH 43614-1501

Valley View Community Unit
District 365U
179 Commonwealth Drive
Bolingbrook, IL 60440-1600

Will County Treasurer
302 N Chicago Street
Joliet, IL 60432-4059

Amy C. Sanders
155 Thackeray Drive
Bolingbrook, IL 60440-1549

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re

) Bankruptcy No. _____
)

) Chapter _____
)

) Hon Pamela Hollis
)

) Joliet

Debtor.



COVER SHEET FOR APPLICATION FOR PROFESSIONAL COMPENSATION
(IN CASES UNDER CHAPTERS 7, 11 AND 12)

Name of Applicant: _____

Authorized to Provide Professional Services to: _____

Date of Order Authorizing Employment: _____

Period for Which Compensation is Sought:

From _____, _____ through _____, _____

Amount of Fees Sought: \$ _____

Amount of Expense Reimbursement Sought: \$ _____

This is an: Interim Application _____ Final Application _____

If this is *not* the first application filed herein by this professional, disclose as to all prior fee applications:

<u>Date</u>	<u>Period</u>	<u>Total Requested</u>	<u>Total Allowed</u>	<u>Fees & Expenses</u>
<u>Filed</u>	<u>Covered</u>	<u>(Fees & Expenses)</u>	<u>(Fees & Expenses)</u>	<u>Previously Paid</u>

Dated: _____

(Cindy M. Johnson, Trustee)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:)
) Case no. 17-11660
Jason B Sanders) Chapter 7
Amy C Sanders) Hon. Pamela S. Hollis
Debtors.)
) Set for December 22, 2017 at 10:00 a.m.

**FIRST AND FINAL APPLICATION OF SPECIAL COUNSEL
FOR INTERIM COMPENSATION AND REIMBURSEMENT AND TO
SHORTENED NOTICE**

Carleen L. Cignetto, and the firm of Carleen L. Cignetto, Attorney at Law
(collectively "Applicant"), attorneys for Cindy M. Johnson (the "Trustee"), not
individually but as Trustee of the estate of (the "Estate"), pursuant to Sections 330 and
331 of the United States Bankruptcy Code (the "Code"), respectfully applies to this
Honorable Court for an award of final compensation and final costs in the amount of
\$1996.92 and asks that it grant such other and further relief as the Court upon hearing
shall deem just and equitable;

IN SUPPORT WHEREOF, Applicant states, and respectfully urges the Court to
find, as follows:

BACKGROUND

1. On April 17, 2017 the Debtors filed a Voluntary Petition For Relief ,
according to the provisions of Chapter 13 of the Code the case was Converted to a case
under Chapter 7 on August 11, 2017 and Trustee was appointed to administer the
assets of the Estate.

2. Trustee determined she needed assistance with respect to Trustee's efforts to
administer real property located at 155 Thackeray Dr., Bolingbrook, IL 60440 (the

“Property”), as Trustee required an attorney experienced in handling real estate closings.

3. On September 1, 2017, an order was entered authorizing the employment of Applicant as Special Litigation Counsel for Trustee to perform all legal services necessary or required relating to Trustee’s attempts to sell and/or sale of the Estate’s interest in real property (the “Employment Date”).

4. At the time of her retention, Applicant agreed to represent the Trustee as her legal counsel as aforesaid in consideration of such compensation and reimbursement as the Court might allow upon applications made pursuant to Section 330 or 331 of the Code.

5. Applicant regularly made and kept records of services rendered on behalf of the Estate, including a summary or description of the services rendered; the date the services were rendered; and the time expended to render the services, in one-tenth-hour increments.

6. The records were made by Applicant, at or about the time the services were rendered, by means of entering them into Applicant’s billing software program, and by reviewing them on a monthly basis for accuracy after.

7. Under this Application, Applicant is also seeking a final award for reimbursement of expenses incurred on behalf of the Trustee. Details regarding those expenses are set forth later in this application.

SUMMARY OF SERVICES RENDERED

8. Since the Employment Date, through December 1, 2017 Applicant has rendered 6.8 total hours of service on behalf of the Trustee for which final compensation is sought. All services were rendered by Carleen L. Cignetto at an hourly rate of \$250.00 per hour for services to assist Trustee with Trustee’s administration/sale of the Property. A chronological summary of the services rendered and expenses incurred is

attached hereto is attached hereto, identified as Exhibit A and incorporated herein by reference.

9. Carleen L. Cignetto became licensed as an attorney in 1986 and has She has concentrated her legal practice in the area of debtor bankruptcy, trustee representation, real estate closings, and general litigation.

10. Applicant seeks interim compensation in the amount of \$1,700.00 for 6.8 hours of services rendered by Carleen L. Cignetto.

11. The costs incurred by Applicant on behalf of the Trustee are also included in Exhibit A. These costs are all costs directly related to Applicant's services to the Trustee. These costs include any filing fee, photocopies (at \$.26 per copy), and postage.

12. Applicant does not seek reimbursement of expenses incurred for routine postage, facsimile transmissions, local or long distance telephone calls or other such administrative functions, although Applicant has incurred such costs in connection with services it rendered on behalf of the Trustee.

13. Applicant seeks reimbursement for expenses in the amount of \$296.92.

STATEMENTS AS TO OTHER MATTERS

14. All services for which Applicant seeks interim compensation hereunder were rendered by Applicant solely on behalf of the Trustee.

15. The rate of compensation Applicant requests for services rendered to the Trustee is the standard rates other attorneys of similar experience, expertise and reputation generally seek as compensation for comparable services rendered in connection with bankruptcy proceedings within this District.

16. Applicant has no agreement or understanding with any person, firm or entity with respect to any determination about the amount of compensation or reimbursement Applicant shall receive for services Applicant renders or expenses Applicant incurs on behalf of the Trustee.

17. No person, firm or entity has promised to provide Applicant any compensation or reimbursement for services Applicant renders or expenses Applicant incurs on behalf of the Trustee. The exclusive source of such compensation and reimbursement, if any, shall be the available funds of the Debtor's Estate.

18. Except as permitted by Section 504(b) of the Code, Applicant has neither shared nor agreed to share with any person, firm or entity, any compensation or reimbursement Applicant may receive for services rendered or expenses incurred on behalf of the Trustee.

WHEREFORE, the Applicant, Carleen L. Cignetto and the law firm of Carleen Cignetto, Attorney at Law, respectfully pray this Honorable Court to grant relief, after hearing upon notice as provided by Rule 2002(a)(6) of the Federal Rules of Bankruptcy Procedure, as follows:

- I.** To award Applicant final compensation in the amount of \$1,700.00 for hourly fees earned;
- II.** To allow Applicant reimbursement of costs expended in the amount of \$296.92;
- III.** To direct the Trustee to disburse said fees and costs to Applicant promptly;
- IV.** Notice is shortened to the 17 days' notice given of this motion to Debtors, Debtors counsel, U.S. Trustee, and to all creditors who have filed claim, and said notice is deemed adequate; and
- V.** To grant the Applicant such other and further relief as the Court upon hearing shall deem just and equitable.

Respectfully Submitted,
CARLEEN L. CIGNETTO and the law firm of
CARLEEN L. CIGNETTO, ATTORNEY AT LAW

BY: /s/ Carleen L. Cignetto
Johnson Legal Group, LLC

Carleen L. Cignetto
Carleen L. Cignetto, Attorney at Law
2 Dearborn Square, #2
Kankakee, IL 60901
(815) 937-5530

Carleen L. Cignetto, Attorney at Law
2 DEARBORN SQ STE 2
KANKAKEE, IL 60901
(815)9375530
cignettolaw@gmail.com

INVOICE

BILL TO

Jason and Amy Sanders
140 S Dearborn, Suite 1510
Chicago, IL 60603

INVOICE # 1587

DATE 10/20/2017

DUE DATE 10/20/2017

TERMS Due on receipt

DATE	ACTIVITY	AMOUNT
09/20/2017	Services Prepared Addendum to Real Estate Contract for Sale of 155 Thackeray 1.0 hr	250.00
10/18/2017	Services Prepared Trustee Motion to Sell 1.0	250.00
10/19/2017	Services Phone conversation with Title Company Re: Title exception .5 hr	125.00
10/20/2017	Services Filed Motion to sell .1	25.00
10/20/2017	Copy costs 46 copies of Motion Notice and Order-332 pages at .26 per page	83.72
10/20/2017	Postage 46 Notice and Motion .70 each	32.20
10/20/2017	Court Costs Filing Fee-Motion to Sell	181.00
11/14/2017	Services Prepared Deed and POA for Trustee Review .8 hr	200.00
11/14/2017	Services email to Trustee Re: Deed and POA .1 hr	25.00
11/17/2017	Services Prepared closing documents .5 hrs	125.00
11/20/2017	Services Travel to Bolingbrook for Transfer stamps .5 hr	125.00
11/20/2017	Services Attendance at Closing 2.0 hrs	500.00
11/22/2017	Services Prepared and filed Report of Sale .3 hr	75.00

BALANCE DUE

\$1,996.92

Exhibit A